

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CAROLYN MILLENDER)

Plaintiff,)

VS.)

Civil Action No. 2: 07-cv145-MHT

H. COUNCILL TRENHOLM STATE)
TECHNICAL COLLEGE and ANTHONY)
MOLINA, in his official capacity as)
President of H. Councill Trenholm State)
College)

Defendants.)

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on March 12, 2007, by telephone, and was attended by:

William Patty, for the Plaintiff Carolyn Millender;

Candis McGowan, for the Plaintiff Carolyn Millender; and

Mary Goldthwaite for the Defendants H. Councill Trenholm State Technical College and Anthony Molina.

2. **Pre- discovery Disclosures.** The parties will exchange by April 9, 2007 the information required by Fed.R.Civ.P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

- Discovery will be needed on the following subjects: Plaintiff's claims, Defendants' defenses, and damages issues.

- All discovery commenced in time to be completed by December 7, 2007.

- Interrogatories:

Plaintiff's Position: As per Rule 33, the maximum number of interrogatories should not exceed twenty-five (25) interrogatories by each party to any other party. (Responses due thirty (30) days after service.)

Defendants' Position: Given the local discovery guidelines and the number and complexity of claims raised in this case a maximum of thirty (30) interrogatories by each party to any other party. (Responses due thirty (30) days after service.)

- Maximum of twenty-five (25) requests for admission by each party to any other party. (Responses due within thirty (30) days after service.)
- Maximum of ten (10) depositions by the Plaintiff and ten (10) depositions by the Defendants.
- Reports for retained experts under Rule 26(a)(2) due:
From Plaintiff by July 16, 2007; and
From Defendants by September 14, 2007
- Supplementations under Rule 26(e) are due as soon as reasonably possible after the information or documents are discovered but no later than 30 days before the close of discovery.

4. Other Items.

- The parties do not request a conference with the Court before entry of the Scheduling Order.
- The parties request a pretrial conference in February 2008.
- Plaintiff should be allowed until June 12, 2007 to join additional parties and until June 12, 2007 to amend the pleadings.
- Defendants should be allowed until July 12, 2007 to join additional parties and until July 12, 2007 to amend the pleadings.
- All potentially dispositive motions should be filed by November 20, 2007.
- Settlement cannot be evaluated prior to undertaking discovery in this case.
- Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From Plaintiff by February 29, 2008

From Defendants by February 29, 2008

- Parties should have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- The case should be ready for trial by March 31, 2008 and at this time is expected to take approximately 3 to 4 days.

Dated: March 15, 2007

/s/ WILLIAM F. PATTY
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